Department of Toxic Substances Control

Incoming Title 16 AR

Edwin F. Lowry, Director
5796 Corporate Avenue
Cypress, California 90630

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

M60050.002880
MCAS EL TORO
SSIC NO. 5090.3

June 26, 2000

Mr. Dean Gould
BRAC Environmental Coordinator
Marine Corps Air Station El Toro
Base Realignment and Closure
P.O. Box 51718
Irvine, California 92619-1718

DRAFT PHASE II WORK PLAN FOR THE MULTI-PHASE EXTRACTION (MPE) PILOT STUDY, OPERABLE UNIT (OU) 3, INSTALLATION RESTORATION PROGRAM (IRP) SITE 16, CRASH CREW TRAINING PIT NO. 2, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) reviewed the above report dated June 2000, and received by this office on June 12, 2000. The draft report presents the work plan for the MPE pilot study to be conducted for IRP Site 16, Crash Crew Training Pit No. 2.

After review of the work plan, DTSC has the following comments:

1. Page 4-1, Section 4.2 - MPE Pilot Study Objectives: The Work Plan notes that soil gas samples for methane and fixed gases will be collected and analyzed to assess biological activity. DTSC supports the collection of the samples; however, it is important to acknowledge the limited utility of the resultant data which essentially represent conditions at a fixed point in time. Long term trends are more important in evaluating biological activity. Also note that the pre-pilot test samples will likely reveal anaerobic subsurface conditions, while the post-pilot test samples likely will show aerobic conditions to some degree. Thus, the pre- and post-pilot test data will be difficult to interpret. The meaningful evaluation of subsurface biological activity will require a much more comprehensive and longer term sampling program.

2. Page 4-16, Table 4-2 - SVE [Soil Vapor Extraction] System Operating Parameter

received
28 Jun 00

Measurements: DTSC recommends that volatile organic compounds (VOCs) in the effluent from the first granular activated carbon (GAC) canister be measured each time the effluent of the second GAC canister (GAC effluent) is measured. Monitoring of VOCs from the first GAC canister will provide information on the on VOC loading and may provide advanced warning of breakthrough.

3. Page 4-16, Table 4-2 - SVE System Operating Parameter Measurements: For consistency with the text on Page 4-12 please include the information for field monitoring of organic vapor concentrations from the extraction well (16MPE1) in Table 4-2.

4. Page 4-24, Section 4.8 - Soil Gas Sampling: The second paragraph states, "Soil gas sampling procedures and quality control are described in detail in the FSP [Field Sampling Plan] (Appendix A).

   Please revise to show that the FSP is included in Attachment A rather than Appendix A.

   Additionally, the collection method described does not correspond to the method described in the Regional Water Quality Control Board (RWQCB) guidance included in Appendix A. The RWQCB guidance states that soil gas samples collected in tedlar bags are only appropriate for qualitative analysis. Please clarify.

   A standard operating procedure that describes the methods and procedures to be followed for soil gas sampling as summarized in Section 4.8 and Section 5.4 of the FSP in Attachment A needs to be included.

5. Attachment A - Field Sampling Plan, Page A4-3, Table 4-2: This table indicates that soil gas samples will be collected before and after the pilot test. The soil gas sampling procedures need to specify the procedure for calculating the initial purge volume, purge rate and method and the collection of representative samples of the vapors in the vadose zone.

If you have any questions, please contact me at (714) 484-5395.

Sincerely,

Triss M. Chesney, P.E.
Remedial Project Manager
Southern California Branch
Office of Military Facilities

cc: Mr. Glenn Kistner
Remedial Project Manager
U. S. Environmental Protection Agency Region IX
Superfund Division (SFD-8-2)
75 Hawthorne Street
San Francisco, California 94105-3901

Ms. Patricia Hannon
Remedial Project Manager
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, California 92501-3339

Mr. Gregory F. Hurley
Restoration Advisory Board Co-chair
620 Newport Center Drive, Suite 450
Newport Beach, California 92660-8019

Ms. Polin Modanlou
MCAS El Toro Local Redevelopment Authority
10 Civic Center Plaza, 2nd Floor
Santa Ana, California 92703

cc: Mr. Steven Sharp
Orange County Health Care Agency
2009 East Edinger Avenue
Santa Ana, California 92705

Mr. Laszlo Saska
Department of Toxic Substances Control
Engineering Services Unit, HQ-29
P.O. Box 806
Sacramento, California 95812-0806

Mr. Marc Smits
Remedial Project Manager
Naval Facilities Engineering Command
Southwest Division - Code 06CC.MS
1220 Pacific Highway
San Diego, California 92132-5187